



CHESTER
ENVIRONMENTAL

134440

Ref. No. 375625-07

February 16, 1994

Mr. David Iacono
Remedial Project Manager
U.S. Environmental Protection Agency
VA/WV Remedial Section (3HW41)
841 Chestnut Street
Philadelphia, Pennsylvania 19107

Dear Mr. Iacono:

Re: Atlantic Wood Industries, Inc.
Portsmouth, Virginia Site
Feasibility Study

On behalf of Atlantic Wood Industries, Inc. (AWI), Chester Environmental is pleased to submit a brief response to comment summary associated with the Feasibility Study (FS) Report for the Portsmouth, Virginia facility. This summary was prepared in response to U.S. Environmental Protection Agency (EPA) comments dated November 2, 1993. The responses are organized by the original U.S. EPA comment number, and include the location of any revision and a brief response.

Also enclosed is a copy of the Feasibility Study on a 3.5-inch computer disk, as you requested.

Please contact Mr. Ross Worsham of AWI at 912-964-1234 or me at 412-269-7642 with any questions or comments you may have concerning these tables.

Sincerely,

Diane E. McCausland
Project Manager

DEM

cc: R. Worsham - AWI (w/o disk)
J. Smigel - AWI (w/o disk)
K. Nguyen - VDEQ (w/o disk)
N. Teamerson - NUS (w/o disk)

Post Office Box 15851
Pittsburgh, Pennsylvania 15244
412-269-5700; Fax 412-269-5749

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Response

SECTION 1.0

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|----|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Page 1-2 | No revision has been made. The name of Wyckoff Creosoting and Pipe Company indicates that they <u>may</u> have performed pressure treating of wood, as stated on page 1-2. |
| 2. | Page 1-7 | This comment has been addressed. |
| 3. | Page 2-7, Table 5-1 | This comment has been addressed. |
| 4. | Page 1-9 | No revision was prepared in response to the first sentence included in this comment. On page 5, the Ecological Risk Assessment states "All the wetlands identified are in a disturbed condition and are of very low functional value based on their small size, low vegetation diversity, scattered vegetation, disturbed soils, and very minimal wildlife usage." which is in agreement with the statement included in the FS. Please also note that the statement included in the FS was also included in the EPA-approved Remedial Investigation (RI) Report. |
| | Page 1-9 | Additional discussion of wetland resources in the general vicinity of the site has been included. |
| 5. | Page 1-10 | Reference to background has been removed from text. |
| 6. | Page 1-10 | No revision has been made. Historically AWI has never stored wood treated with chromated copper arsenate (CCA) in the area adjacent to the Navy property. The area where the acetylene sludge was deposited was low lying and unsuitable for storing treated wood products. In addition, groundwater concentrations of zinc, copper, and arsenic are elevated in the area adjacent to the acetylene sludge and along the Navy property, and are not elevated in other areas of the site. It also should be noted that the Navy may be identified as a potentially responsible party (PRP) at the Portsmouth site. |
| 7. | Page 1-11 | No revision has been made. The conclusions were made based on existing data, and are similar to conclusions made in the RI Report. |



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8. Figures 1-4
through 1-7,
Table 1-1

This comment has been addressed.

9. Page 1-17

Review of the DNAPL map and profiles indicates that the vertical distribution of DNAPL has been well-defined over most of the site with the exception of the historic disposal area. Further delineation of DNAPL occurrences in this area, as well as other site areas where isolated occurrences of DNAPL have been observed, will be conducted as part of the Supplemental RI Work Plan. The FS has been amended to state that further delineation will be performed as needed.

10. Page 1-17

The statement has been eliminated.

11. Page 1-22

This comment has been addressed.

SECTION 2.0

1. Page 2-7

The revision has been made.

2. Pages 2-7
through 2-10

The revision has been made.

3. Page 2-11

The revision has been made.

4. Appendix B

The cleanup levels have been recalculated.

Table 2-6

The FS has been based on a 1×10^{-5} risk level.

Section 5.2

Average residual risk has been added for each alternative.

6. Pages 2-14
through 2-16

A description of volume calculations has been included.

Figures 2-2
through 2-7

The requested figures have been included.

Page 2-19

Institutional controls are discussed.

7. Pages 2-14
through 2-16

All areas have been addressed.

8. Page 2-14,



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| | Table 2-8 | Pentachlorophenol and arsenic have been addressed. |
| 9. | Page 2-19 | Limited action options have been described. |
| | Section 5 tables | Costs for applicable limited action options have been included. |
| | Page 2-20 | A description of bioassay testing has been included. |
| 10. | Page 3-8 | Additional detail for soils excavation has been included. |
| | Page 3-27 | Additional detail for sediments excavation has been included. |
| | Section 2.5.4 | Further discussion of the high water table is included for retained in situ technologies, and also for technologies that were eliminated based on the high water table. |
| 15. | Pages 2-26 through 2-28 | A full range of biological treatment options have been retained. |
| | Page 2-18 | This comment has been addressed. |
| 16. | Tables 2-1 through 2-14 | Revisions have been made as necessary. |
| 17. | Table 2-3 | This comment has been addressed. |
| 18. | Table 2-6 | This comment has been addressed. |

SECTION 3.0

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| 1. | General | Additional alternatives have been developed and more detailed descriptions have been included. |
| | Section 5.2 | Average residual risks have been presented. |
| | Appendices C through E | Unit costs and quantities have been provided. |
| 2. | Table 2-16 | This comment has been addressed. |
| 3. | Pages 3-6 and 3-7 | This comment has been addressed. |



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| 4. | Page 3-8 | Soils materials handling and the air pathway have been addressed, and included in estimates. |
| | Page 3-27 | Sediments handling has been discussed. |
| 5. | General | Order-of-magnitude costs have been revised. |
| 6. | General | Order-of-magnitude costs have been revised. |
| 7. | Section 5.0 | Land Disposal Restrictions have been addressed. |
| | Page 3-9 | Flood protection has been discussed. |
| | General | On-site landfilling has a lower cost than surface capping because of the extensive area that would require capping. |
| 8. | Page 3-25 | This comment has been addressed. |
| 9. | Page 2-30 | This comment has been addressed. |

SECTION 4.0

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| 1. | General | Additional detail has been provided in this section. |
| 2. | General | Chemical compatibility would be addressed during remedial design. |
| | General | Depth to groundwater has been clarified. |
| | Page 3-5 | Surface capping has been eliminated. |
| 3. | Page 4-10 | No revision has been made. Discussions with vendors indicate that the description is correct. |

SECTION 5.0

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| 1. | Table 5-1 | This comment has been addressed. |
| 2. | General | This comment has been addressed. |
| 3. | Page 5-15 | This comment has been addressed. |
| 4. | General | This comment has been addressed. |



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| 5. | Page 5-34 | Cost have been revised. |
| 6. | General | This comment has been addressed. |
| 7. | Page 5-55 | Pumping and hand-bailing are being considered as methods of recovering mobile DNAPL only. Recovery of residual DNAPL will be attempted following removal of mobile DNAPL to the extent possible, and will most likely involve groundwater extraction. Recovery of residual product will be addressed as part of the separate Feasibility Study for groundwater remediation to be performed at a later date. |

SECTION 6.0

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| 1. | General | This comment has been addressed. |
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APPENDICES

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| 1. | Acronyms | This comment has been addressed. |
| 2. | Appendix B | This comment has been addressed. |